

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

RICHARD JORDAN and RICKY CHASE,)
)
)
Plaintiffs,)
)
THOMAS EDWIN LODEN, Jr.,)
)
)
Putative Intervenor,)
)
<i>v.</i>) Civil Action No. 3:15-cv-00295
)
MARSHALL L. FISHER, Commissioner, Mississippi Department of Corrections, in his Official Capacity, et al.)
)
)
Defendants.)
)
)

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

PLAINTIFFS, Richard Jordan and Ricky Chase, by and through their counsel of record, move this Court, pursuant to Rule 65 of the Federal Rules of Civil Procedure, for a Preliminary Injunction to prevent irreparable injury pending a final adjudication of this case.

In support of this Motion, Plaintiffs submit Exhibits 1 through 6 as described in the docket entry accompanying this Motion (Doc. 21-1 through 21-6), together with their Memorandum in Support of Motion for Preliminary Injunction filed contemporaneously with this Motion (Doc. 22). The Exhibits and Memorandum are incorporated herein by reference.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully requests that this Court enter a Preliminary Injunction enjoining the Defendants during the execution of the Plaintiffs, including any intervening party to this suit, from:

- A. administering any anesthetic that is not in the statutorily-mandated class of “ultra short-acting barbiturates”;
- B. administering any drug that is not manufactured under the regulation of the Food and Drug Administration (FDA);
- C. administering any drug that is produced by means of “non-traditional pharmacy compounding” as that term is used by the FDA;
- D. administering any drug which has passed its expiration date; and
- E. administering (1) any chemical paralytic agent and (2) any drug for stopping the heart, including but not limited to potassium chloride.

Respectfully submitted,

/s/ James W. Craig

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Dated: June 3, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have filed this pleading with the Electronic Case Filing System of the United States District Court for the Southern District of Mississippi, and have thereby served counsel of record for the Defendants in this case.

This, the 3rd of June, 2015.

/s/James W. Craig